

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
AUG 5 2 11 PM '97
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997)

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS PAUL M. LION
(OCA/USPS-T24-37-40)
August 5, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

Respectfully submitted,

Gail Willette

GAIL WILLETTE

Director

Office of the Consumer Advocate

Shelley S. Dreifuss

SHELLEY S. DREIFUSS

Attorney

OCA/USPS-T24-37. Please refer to the excel file "caller service," sheet "Key Parameters," and footnote (5) in LR-H-107, which refers to "USPS LR-SSR-104."

- a. Please confirm that the "Total Number of Firms or Callers" from USPS LR-SSR-104 is 43,435. If you do not confirm, please explain.
- b. Please provide the source for the figure, 44,045, the "Total Number of Firms or Callers" from LR-H-107.
- c. Please explain the discrepancy between the figure, 44,045, the "Total Number of Firms or Callers" from LR-H-107, and the figure from part a. above.

OCA/USPS-T24-38. Please refer to your testimony at page 15, Table 7D. In the column "Pre 96-3 Boxes," please explain the origin and development of the figure, 110,370, for caller service. Please show all calculations and provide citations for any figure used.

OCA/USPS-T24-39. Please refer to your testimony at page 15, Table 7D., and PRC Op. MC96-3, Appendix D, Schedule 3, Table 12.

- a. In Table 7D., please confirm that the figure for "Post 96-3 Boxes" for Caller Service is 110,370. If you do not confirm, please explain.
- b. Please confirm that the TYAR number for caller service from Table 12 is 89,055. If you do not confirm, please explain.
- c. Please explain why you did not use the Commission's TYAR figure of 89,055 for caller service as the figure for "Post 96-3 Boxes" for Caller Service in Table 7D?

- d. Please explain the discrepancy between the figure in part a. above and the figure, 89,055, from Table 12.

OCA/USPS-T24-40. Please refer to your testimony at page 15, Table 7D, and the table below.

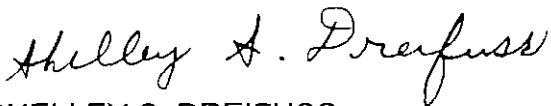
<u>Delivery/Fee Group</u> [A]	<u>Pre 96-3 Fees</u> [B]	<u>Post 96-3 Fees</u> [C]
IA/A	\$500	\$500
IB/B	\$480	\$480
IC/C	\$450	\$450
II/D	\$134	\$450

- a. Please confirm that the annual fees for caller service prior to PRC Op. MC96-3, are those shown in column [B]. If you do not confirm, please explain.
- b. Please confirm that the annual fees for caller service recommended by the Commission in PRC Op. MC96-3, are those shown in column [C]. If you do not confirm, please explain.
- c. Please confirm that caller service customers in Delivery/Fee Group II/D experienced a fee increase of 236 percent. If you do not confirm, please explain.
- d. Please show the origin and development of the figure, \$451, in the column "Pre 96-3 Fees" in Table 7D. Please show all calculations and provide citations for any figure used.
- e. Please explain why there is no elasticity for caller service in the column, "Elasticity," in Table 7D.

- f. Please confirm that the elasticity for caller service in Table 7D. should be -0.152210643231. If you do not confirm, please explain and provide the correct figure.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


SHELLEY S. DREIFUSS
Attorney

Washington, D.C. 20268-0001
August 5, 1997